



Pulaski County

Office of the Sheriff

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November 24, 2003

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: In the Matter of Improving Public Safety Communications in the 800 MHz Band, WT
Docket No. 02-55 (Ex Parte)

Dear Secretary Dortch:

I am writing to express my concerns regarding the "consensus plan." I do believe there are significant shortcomings with this plan and I urge you not to adopt it in its present form.

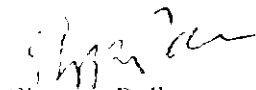
- ❖ The plan is too broad. It will force even public safety communications departments which **DO NOT** have interference problems to "reband." This will be quite expensive and disruptive to emergency service providers nationwide. There is no guarantee that Public Safety licensees will be able to continually operate their communications systems during the process. Why not focus resources and disruption in the limited number of areas where interference actually occurs?
- ❖ The funding mechanism is much too vague. I am not at all convinced that the \$850 million pledged would be sufficient to implement the proposed plan. In particular, I am concerned that my costs might not be covered.
- ❖ The relocation costs of Pulaski County Sheriff's Office may be expended prospectively, but reimbursed retroactively. This would adversely affect an already tight budget.
- ❖ There are no guarantees that my legitimate costs will be reimbursed. I will be forced to pay for the relocation and then request that my costs be considered for reimbursement. What if I am turned down? What if the money runs out? Where are the specific guidelines for which costs will definitely be approved?
- ❖ Funding for the plan assumes that only 1% of receivers will be replaced. This figure seems low. How was it arrived at, what happens if more replacements are needed?
- ❖ The plan will still require that public safety communications groups adopt best practices and implement technical solutions which would have mitigated much of the interference even without the rebanding. Why are we solving this problem twice?

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- ❖ All Public Safety licensees are required to relocate in the same time frame. Given the complexity of some Public Safety systems, I am concerned that this rebanding will lead to communication failures

The Pulaski County Sheriff's Office currently utilizes an 800 MHz communications system which is used by the Police Departments, the Fire Departments, and Emergency Service throughout the county. Each of these departments is obviously involved in providing essential services our citizens. We are certainly not supportive of any change to its current communications system what would affect emergency management and Homeland Security responsibilities.

Sincerely,



Skipper Polk
Chief Deputy

Cc: file